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September 22, 2020

Via ECF

Hon. Lorna G. Schofield
United States District Court
500 Pearl Street
New York, New York 10007

The application is GRANTED. By **October 8, 2020**, the parties shall jointly file a status letter identifying the parties who remain in the action and will participate in trial. The telephonic status conference scheduled for October 1, 2020 is ADJOURNED to **October 22, 2020, at 10:40 a.m.** The conference will occur on the following conference line: (888) 363-4749, access code: 5583333. The time of the conference is approximate, but the parties shall ensure that they are dialed into the conference line by the appointed conference time.

Dated: September 23, 2020
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *John Cottam v. Global Emerging Capital Group, LLC, et al.*, 1:16-cv-4584-LGS-SN
Joint Letter Requesting Adjournment of the Joint Status Letter and Status Conference

Dear Judge Schofield:

We represent Defendants 6D Acquisitions, Inc. and 6D Global Technologies, Inc. in the above-referenced action. Pursuant to the Court's Order dated September 4, 2020 (Doc. 311), the Court ordered the parties to file a joint status letter by September 24, 2020, before the telephonic conference currently scheduled for October 1, 2020 at 10:40 a.m. For the reasons set forth below, the Plaintiff, the Defendants, and the Third-Party Defendants (except for Third-Party Defendant John Hurst, who has not responded to our emails or phone call) respectfully jointly request a two-week extension of the joint status letter, and a three-week extension of the status conference before Your Honor.

Under the supervision of Magistrate Judge Netburn, the Defendants and five of the Third-Party Defendants appear close to a settlement. A settlement agreement has been circulated, and we are awaiting comments to the agreement. Because we expect that it will take a bit of time to finalize, we respectfully request that the September 24, 2020 deadline to submit a joint status letter be adjourned two weeks to October 8, 2020. In addition, we respectfully request that the October 1, 2020 status conference be adjourned three weeks to October 24, 2020, or to a day thereafter convenient for the Court. Please note that the undersigned will be undergoing hernia surgery on October 14, 2020, which is the reason why a three-week extension is requested for the status conference.

We believe that the adjournment will help narrow the issues for trial because, if the settlement is successful, the only parties remaining in the action will be the Plaintiff and the two corporate defendants. We thank the Court for its consideration.

Respectfully submitted,

/s/ Tom M. Fini

Tom M. Fini, Esq.

cc: all parties (via ECF)

Tom M. Fini

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